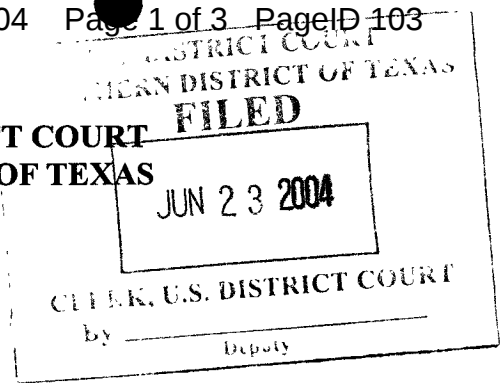


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



ROBERT N. GOLDSTEIN,
GOLDSTEIN/HABEEB
ENTERTAINMENT, INC., and
CHEATERS, LTD.,
Plaintiffs

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CAUSE NO. 304CV-677-P

vs.

TOMMY HABEEB
Defendant

PLAINTIFFS' MOTION FOR EXTENSION OF TIME
TO FILE BRIEF WITH AUTHORITIES

TO THE HONORABLE JUDGES OF SAID COURT:

Plaintiffs, Robert N. Goldstein (Goldstein), Goldstein/Habeeb/McCalmont Entertainment, Inc. (GHE) and Cheaters, Ltd. (Cheaters), pursuant to Rule 6(b) of the Federal Rules of Civil Procedure (FRCP), move the Court for an order extending the time in which Appellants may file their response to the Defendant's Motion for Summary Judgment and in support of same would respectfully show the Court as follows:

I.

Appellants intend to file response to the Defendant's Motion for Summary Judgment. No previous extensions of the time to file a response have been granted. Plaintiffs' response is now due on June 23, 2004.

II.

Defendant's motion for summary judgment and brief pose complex issues requiring additional briefing and requires a short extension of the time to complete the responsive brief.

III.

Plaintiffs' counsel requests a seven (7) day extension of the time to prepare, serve and file Plaintiff's response to Defendant's motion for summary judgment, until June 30, 2004.

IV.

This motion is made not for delay only, but is propounded in the interest of judicial economy and that justice may be done.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs pray that the Court grant Appellants an extension of the time in which to file their response to Defendant's motion for summary judgment so that Plaintiffs may adequately brief each issue which they believe the Court should consider. Plaintiffs pray for such other and further relief to which they may show themselves justly entitled, at law or in equity.

Respectfully submitted,



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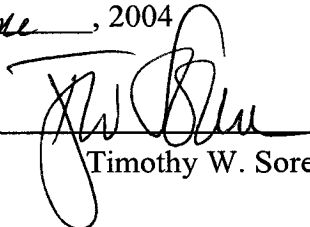
Fax: (214) 373-0843

Attorney for Plaintiff,

Goldstein/Habeeb/McCalmont Entertainment, Inc.

CERTIFICATE OF SERVICE

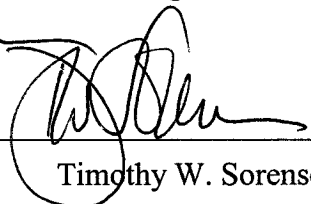
I certify that a true and correct copy of the foregoing Plaintiff's Motion for Summary Judgment has been served by hand delivery or by facsimile and first class mail, upon all counsel of record in the above-styled and numbered cause in accordance with Rule 5, Federal Rules of Civil Procedure, on this 23 day of June, 2004



Timothy W. Sorenson

CERTIFICATE OF CONFERENCE

This is to certify that I have attempted to confer with Andrew Bergman, counsel for Tommy Habeeb, regarding the merits of the foregoing motion. I was advised that Mr. Berman is in trial and would be unable to respond to my call for two to three days. As a response is due on Wednesday, June 23, 2004, time does not permit me to wait until Mr. Bergman and I can confer regarding the merits of this motion.



Timothy W. Sorenson